Blake D. Miller (4090)
Barry C. Toone (13443)
Deborah R. Chandler (12057)
MILLER TOONE, P.C.
165 South Regent Street
Salt Lake City, UT 84111
Telephone: 801.363.5600
Facsimile: 801.363.5601

Facsimile: 801.363.5601 miller@millertoone.com toone@millertoone.com chandler@millertoone.com

Attorneys for Plaintiff

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

SHEILA KNOP STEVENSON, individually, and as heir and personal representative of the ESTATE OF MICHAEL EUGENE KNOP,

Plaintiff,

VS.

McNEIL-PPC, INC., McNEIL CONSUMER HEALTHCARE, JOHNSON & JOHNSON, INC., and JOHN DOE CORPORATIONS 1-10,

Defendants.

APPLICATION FOR ENTRY OF DEFAULT CERTIFICATE

Civil No. 2:14-cv-00667-EJF

Judge: Magistrate Evelyn J. Furse

Pursuant to Fed. R. Civ. P. 55, Plaintiff Sheila Stevenson, by and through her counsel of record, respectfully requests that the Clerk enter the default certificate against Defendant Johnson & Johnson, Inc., ("Defendant"). The grounds for entry of default are as follows:

1. Plaintiff commenced this action by filing a Complaint and Jury Demand against Defendant on September 15, 2014 (the "Complaint").

- 2. On October 22, 2014, the registered agent for Johnson & Johnson was served via process server.
  - 3. The executed, returned Summons was filed with the Court on October 28, 2014.
  - 3. The deadline for filing an answer to the Complaint was November 12, 2014.
  - 4. Defendant has not appeared, answered or otherwise responded to the Complaint.

WHEREFORE, Plaintiff respectfully requests the Clerk enter a default certificate against Defendant in the form attached hereto as Exhibit A.

DATED this 10th day of December, 2014.

MILLER TOONE, PC

/s/ Deborah R. Chandler

Deborah R. Chandler

Barry C. Toone

Attorneys for Plaintiff